

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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SECURITIES AND EXCHANGE COMMISSION,	:
	:
Plaintiff,	:
	:
– against –	:
	:
BARRY C. HONIG, ROBERT LADD,	:
ELLIOT MAZA, BRIAN KELLER,	:
JOHN H. FORD, GRQ CONSULTANTS, INC., and	:
HS CONTRARIAN INVESTMENTS, LLC,	:
	:
Defendants.	:
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18 Civ. 8175 (ER)

ECF CASE

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the Court’s September 29, 2023 summary judgment decision in this case finding Defendant Robert Ladd liable on certain claims of Plaintiff Securities and Exchange Commission (“SEC”) (DE 333) (“Summary Judgement Decision”); the Memorandum of Law in Support of Plaintiff’s Motion for Relief Against Defendant Robert Ladd; and the accompanying Declarations of Ricky Tong and Jack Kaufman and Exhibits thereto, the SEC will move this Court, at a date and time to be determined by the Court, before the Honorable Edgardo Ramos, at the Thurgood Marshall United States Courthouse for the Southern District of New York, 40 Foley Square, New York, New York 10007, for a final judgment granting the SEC the following relief against Defendant Robert Ladd: (1) \$1,127,306 in civil money penalties; (2) a bar prohibiting Ladd from acting as an officer or director of a public company; and (3) injunctions against future violations of the federal securities laws for which the Court found Ladd liable in its Summary Judgment Decision.

Dated: February 23, 2024
New York, NY

Respectfully submitted,

s/ Jack Kaufman

Jack Kaufman

Katherine Bromberg

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Attorneys for Plaintiff Securities
and Exchange Commission